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March 11, 2020

VIA ECF

Hon. Brian M. Cogan, U.S.D.J. United States District Court for the Eastern District of New York 225 Cadman Plaza East Chambers 704S Brooklyn, New York 11201

Re: Munoz v. 640, LLC

Civil Action No.: 1:19-cv-5751-BMC

Dear Judge Cogan:

This firm represents Defendants in the above matter.

I came down with a cold this weekend that caused me to adjourn Plaintiff's, Elvin Alcantara, deposition scheduled for Monday. We have rescheduled it for March 23, 2020 and my client is now scheduled for March 30, 2020.

Out of an abundance of caution and respect for the court and my colleague, I am respectfully requesting permission to appear by phone for tomorrow's 10:30 a.m. conference. If Your Honor requires my appearance in person, I respectfully request the opportunity to confer with Mr. Rozenberg and provide the court with convenient dates.

Respectfully submitted,

/s/ Todd A. Rossman

Todd A. Rossman

cc: Zachary Rozenberg, Esq. – via ECF